



4. Intervenor's breach-of-contract and breach-of-fiduciary duty claims (Counts IV–VI in both Complaints) fail because these individuals' R830 and R1500 contracts were terminable at will.

5. The breach-of-contract claims of Intervenor's residing in Colorado, Florida, Illinois, Iowa, Louisiana, Minnesota, Mississippi, New York, Pennsylvania, Texas, And Washington (Counts IV–V in both Complaints) fail based on the expiration of the applicable statute of limitations.

6. All Intervenor's breach-of-fiduciary-duty claims (Count VI in both Complaints) fail based on the expiration of the applicable statute of limitations.

WHEREFORE, Allstate respectfully requests that the Court grant its Motion to Dismiss, dismissing the above claims in the *Anzvine* and *Siegfried* Intervenor Complaints with prejudice, and grant it all other appropriate relief.

\* \* \*

Dated: November 2, 2015

Respectfully submitted,

/s/ Jordan M. Heinz

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served on November 2, 2015, by the Court's Electronic Case Filing system and by electronic mail on all counsel of record.

/s/ Jordan M. Heinz